

**PEPIN BROADCASTING CORPORATION**

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(612) 699-1776

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December 13, 1995

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The Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: Petition for Rule Making for New FM Assignment  
at Lake City, Minnesota

Dear Secretary:

Pepin Broadcasting Corporation hereby respectfully requests that the Commission adopt a rule making to assign FM Channel 235A to Lake City, Minnesota.

Enclosed are an original and four (4) copies of the engineering exhibit in support of this request.

It is our intention to apply for a construction permit to operate on the requested channel, when it is assigned.

Sincerely yours,



Steven T. Moravec  
President

STM:glm  
Enclosures

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ENGINEERING REPORT

A PETITION FOR RULE MAKING  
TO AMEND THE FM TABLE OF ALLOTMENTS

TO ASSIGN FM CHANNEL 235A  
TO LAKE CITY, MINNESOTA

DECEMBER 1995

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## ENGINEERING STATEMENT

This Engineering Statement and the attached Figure 1 have been prepared by B. Benjamin Evans of Evans Associates, Consulting Communications Engineers in Thiensville, Wisconsin. This exhibit supports a petition by Pepin Broadcasting Corporation requesting modification of the Table of FM Allotments to specify FM Channel 235A at Lake City, Minnesota.

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Evans Associates has been retained by Pepin Broadcasting Corporation ("petitioner") to prepare the engineering portion of a petition for rule making to assign FM Channel 235A to Lake City, Minnesota. The city of Lake City is located in Wabasha and Goodhue Counties in southeastern Minnesota. The population of Lake City in 1990 was 4,433 persons.

As a result of a frequency search conducted by this office, it has been determined that Channel 235A may be assigned to Lake City, Minnesota as a "drop-in" without affecting any existing or proposed FM authorizations. Therefore, it is requested that Section 73.202(b) of the FCC Rules and Regulations be amended in the following manner:

<u>Community</u>	<u>Proposed</u>
Lake City, Minnesota	235A

It is the petitioner's intention to apply for a construction permit to operate on the FM channel proposed herein, if it is assigned.

The reference point coordinates of Lake City are:

N. 44°-26'-48" ; W. 92°-15'-48"

The assignment of Channel 235A to Lake City will meet all minimum distance separation requirements under the FCC rules if the transmitter site is located at least 10.5 kilometers southwest of the center of Lake City.



**Engineering Statement - Page 2**  
**Lake City, Minnesota**

The transmitter site coordinates assumed for the purposes of this petition for rule making are:

**N. 44°-22'-30" ; W. 92°-21'-00"**

From this location, the city of license coverage would be assured, even at modest Class A transmitting facilities.

Channel 235C2 had been allotted to Albert Lea, Minnesota as per a proposed modification by station KCPI, presently operating on Channel 237A at Albert Lea. Communications Properties, the licensee of KCPI, held a construction permit for the Class C2 facilities (FCC File No. BPH-881122IE); however, the facility was never built, and the Commission, by letter dated November 16, 1994, canceled the construction permit. The authorized KCPI facility was to be located 93 kilometers southwest of the herein-proposed Channel 235A in Lake City, and thus would have precluded the assignment of this channel in Lake City. Communications Properties no longer intends to take any further action regarding the Class C2 assignment (see attached letter from Communications Properties). Moreover, the Channel 235C2 allotment at Albert Lea is not available to anyone other than KCPI, since use of this channel would necessarily technically conflict with the present operation of KCPI. Therefore, since Communications Properties will not pursue Channel 235C2 in Albert Lea, Channel 235A is now available to be assigned to Lake City.

In view of the above, it is believed that the assignment of Channel 235A to Lake City, Minnesota would be in the public interest.

The foregoing statement and the attached figures are true and accurate to the best of my knowledge and belief.

**B. Benjamin Evans**

**December 12, 1995**



Engineering Statement - Page 3  
Lake City, Minnesota

### **ATTACHED FIGURES**

Figure 1 - - - - - Allocation Study - FM Channel 235A, Lake City MN  
Figure 2 - - - - - Letter from Communications Properties

.PRM\_Lake.Doc



**FIGURE 1**

Page 1  
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Evans Associates  
210 S. Main Street  
Thiensville, WI 53092  
FM FREQUENCY ALLOCATION STUDY

Channel: 235A ( 94.9 MHz) 6 KW ERP  
Coordinates: 44 - 22 - 30 92 - 21 - 0 100 M HAAT  
Job Title: PEPIN BCG CORP - LAKE CITY MN  $\Phi$  indicates 73.215 Facility

Cl.A Spacing: 73.207

CALL	$\Phi$	CITY	CH/CL-ZN	HERP	VERP	-kw	LATITUDE	BEAR-to	DIST-km	REQ
STATUS	ST-CTRY	FCC#	(m)-HAAT	MAXHAT	HAMSL	LONGTUDE	-from- $^{\circ}$ T	CLEAR-km	-km	

KSTPFM	St. Paul	233C	100.	100.	BT	45 3 45	321.1 $^{\circ}$	98.7	94.5	
LIC	MN US	BMLH910923KF	372	395	647	93 8 22	140.5 $^{\circ}$	+4.2		

■KSTP-FM, Inc.

WQRB	Bloomer	236C3	8.9	8.9		44 55 44	45.8 $^{\circ}$	88.9	88.5	
LIC	WI US	BLH940113KC	166	200	460	91 32 31	226.3 $^{\circ}$	+0.4		

■Bloomer Broadcasting Co., Inc.

KAGEFM $\Phi$	Winona	237C3	11.0	11.0		44 2 31	124.5 $^{\circ}$	65.1	41.5	
LIC	MN US	BLH920715KA	151	243	443	91 40 47	305.0 $^{\circ}$	+23.6		

■KAGE, Incorporated

>> \*\*\* CHANNEL SUITABLE FOR ASSIGNMENT \*\*\* <<



COMMUNICATIONS PROPERTIES, INC.

319-583-6475

FAX 319-583-4535

5490 SARATOGA RD.

P.O. BOX 1280

DUBUQUE, IA 52004-1280

Philip T. Kelly  
President

November 30, 1995

To Whom it May Concern:

Communications Properties, Inc. does not intend to take any further action regarding expired construction permit BPH 8811221E. Our plans do not include any use now or in the future of that frequency.

Sincerely,

Philip T. Kelly  
President

KATE-KRGR

ALBERT LEA,  
MINNESOTA

WDBQ-KLYV

DUBUQUE,  
IOWA